

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

WAYNE BALIGA,

Plaintiff,

- against -

LINK MOTION INC. (F/K/A NQ MOBILE INC.),
VINCENT WENYOUNG SHI, JIA LIAN, XIAO YU,
Defendants.

USDC SDNY
DOCUMENT
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DATE FILED: 3/15/2022

No. 1:18-cv-11642-VM-DCF

**ORDER TO SHOW CAUSE TO ENJOIN EXTRAORDINARY
GENERAL MEETINGS AND STRIKE
PROPOSED SHAREHOLDER RESOLUTIONS**

Upon the declaration of Michael James Maloney, dated March 15, 2022, and all exhibits attached thereto, and the accompanying memorandum of law dated March 15, 2022, and all documents referenced therein, it is

ORDERED that Robert Seiden, as temporary receiver (“Receiver”) of Link Motion Inc., f/k/a NQ Mobile Inc. (the “Company”) show cause before the Honorable Victor Marrero, United States District Judge of the United States District Court for the Southern District of New York, via teleconference on March 25, 2022, at 12:00 pm, or as soon thereafter as counsel may be heard, why an order should not be issued pursuant to Federal Rule of Civil Procedure 65:

(a) enjoining all extraordinary general meetings (“EGMs”) of the Company called by the Receiver, including those noticed for March 18 and 19, 2022 (the “1st Notice” and “2d Notice,” respectively), until at least thirty (30) days after the District Court issues its decision on the Report & Recommendation issued by the Hon. Magistrate Judge Debra Freeman (Dkt. No. 275) (the “Report & Recommendation”) regarding the pending motion by Defendant Vincent Wenyoung

Shi (“Mr. Shi”) to discharge the Receiver and dissolve the preliminary injunction, Dkt. Nos. 227, 230, 246, 277 (the “Discharge Motion”), and

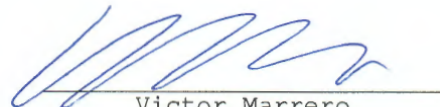
(b) striking from the 2d Notice of EGM scheduled for March 19, 2022 that certain proposed resolution number 2.1, recommending that the shareholders vote to direct the Company to continue the receivership and comply with the Order of this Court dated February 1, 2019 (*i.e.*, Dkt. No. 26); and

(c) striking from the 2d Notice of EGM scheduled for March 19, 2022 that certain proposed resolution number 2.2 recommending that the shareholders vote to ratify the prior actions of the Receiver; and it is further

ORDERED that, sufficient reason having been shown therefor, pending the hearing of Mr. Shi’s application for a preliminary injunction pursuant to Federal Rule of Civil Procedure 65, the EGMs of the Company called for March 18 and 19, 2022 are hereby temporarily enjoined; and it is further.

ORDERED that the parties shall meet and confer and submit a joint proposed briefing schedule within two (2) days of the date of this order. In accordance with the schedule, as approved by the Court, opposition papers, if any, shall be filed by the Receiver with this Court and served by notice of electronic filing on ECF or email upon Plaintiff or his counsel, and reply papers shall be filed and served in the equivalent manner.

Dated: March 15, 2022
New York, New York



Victor Marrero
U.S.D.J.